

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT JUN 19 2014
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION DAVID J. MALAND, CLERK

BY DEPUTY

UNITED STATES OF AMERICA

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§

No. 4:14CR 111
Judge Scheff

v.

ALEXANDER GROYS

§

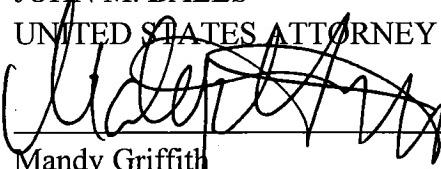
ELEMENTS OF THE OFFENSE

The defendant, **Alexander Groys** ("Groys"), is charged in Count One of the Information with violating 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2), Possession of Child Pornography. The elements of the offense that the government must prove beyond a reasonable doubt, but that **Groys** would admit if his plea is accepted, are:

1. The defendant knowingly possessed one or more materials which contained any visual depiction of a minor engaged in sexually explicit conduct;
2. Such visual depiction had been mailed, shipped, or transported in interstate or foreign commerce, by any means, including by computer, or was produced using materials which had been so mailed, shipped, or transported;
3. The production of the visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct; and
4. The defendant knew that the visual depiction involved the use of a minor engaging in sexually explicit conduct.

Respectfully submitted,

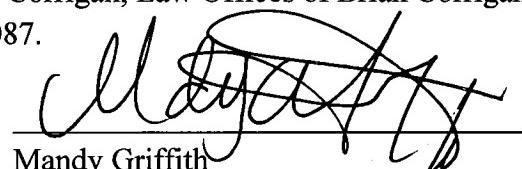
JOHN M. BALES
UNITED STATES ATTORNEY


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CERTIFICATE OF SERVICE

I certify that on June 18, 2014, a true and correct copy of the forgoing was served by regular U.S. mail to the defendant's attorney, Brian Corrigan, Law Offices of Brian Corrigan, 815 Townsend Drive, Suite 109, Rockwall, TX 75087.


Mandy Griffith